

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	
	:	
DKYLE JAMAL BRIDGES	:	CRIM. NO. 18-193-1
KRISTIAN JONES	:	
ANTHONY JONES	:	

**GOVERNMENT'S POST-HEARING RESPONSE BRIEF IN FURTHER OPPOSITION  
TO DEFENDANT DKYLE JAMAL BRIDGES' MOTION TO SUPPRESS PHYSICAL  
EVIDENCE FROM FORD TAURUS**

Defendant Dkyle Jamal Bridges' post-hearing brief in support of his motion to suppress evidence from the Ford Taurus (ECF No. 164) provides no additional support for his suppression argument, and his motion should be denied. The Government believes that the grounds for denying the motion are already well established, but for clarity of the record notes the following in response to his newly raised reliance on state and local law and policy: Assuming only for the sake of argument that local police did not comply with state or local law or policy when impounding his Taurus,<sup>1</sup> it is well-established that such violations do not result in suppression in a federal case. *See, e.g., United States v. Bedford*, 519 F.2d 650, 655 n.11 (3d Cir. 1975); ECF No. 166, at 1-2 (citing additional cases when defendant Kristian Jones made a similar argument for suppression based on purported violation of a state law or rule).<sup>2</sup>

---

<sup>1</sup> While Bridges attaches a purported Philadelphia Police Department *Directive* 92 from 2010, for example, he provides nothing to indicate it was in effect in 2017, or that there were not other circumstances pursuant to which a vehicle could be impounded.

<sup>2</sup> The Government disagrees with Bridges' characterizations of parts of the testimony elicited at the hearing, but in the interest of efficiency does not address those here, as the instant motion should be denied without further debate.

For the reasons set forth here and previously, the Court should deny the defendant's motion and find such evidence admissible.

Respectfully submitted,

WILLIAM M. McSWAIN  
United States Attorney

s/ Jessica Urban  
SETH M. SCHLESSINGER  
Assistant United States Attorney  
PRIYA DE SOUZA  
Assistant United States Attorney  
JESSICA URBAN  
Trial Attorney  
Child Exploitation & Obscenity Section  
U.S. Department of Justice

Dated: March 7, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that on March 7, 2019, I filed this document electronically using the CM/ECF system and thereby caused a copy of the same to be served on all counsel of record.

s/ Jessica Urban  
JESSICA URBAN  
Trial Attorney  
Child Exploitation & Obscenity Section  
U.S. Department of Justice